

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 18-CR-150 (DWF/HB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL HARI (1),

Defendant.

)
)
)
) **NOTICE OF THE GOVERNMENT’S**
) **INTENT TO IMPEACH PURSUANT**
) **TO FEDERAL RULES OF**
) **EVIDENCE 609**
)
)

The United States of America, by and through its attorneys Erica H. MacDonald, United States Attorney for the District of Minnesota, and Julie Allyn, John Docherty and Allison Ethen, Assistant United States Attorneys, and pursuant to Rule 609 of the Federal Rules of Evidence, submits this notice of its intent to impeach Defendant. Specifically:

The United States intends to impeach Defendant Michael Hari (“Hari”), should he choose to testify at trial, regarding the following convictions:

On October 13, 2006, Hari was convicted of child abduction in the State of Illinois, Ford County District Court, Case No. 05-CR-46. A jury found Hari guilty, he was sentenced to 30 months of probation and 90 days in jail.

Copies of the certified conviction documents have been provided to defense counsel. The probative value of the above-cited evidence outweighs any prejudicial effect. Fed. R. Evid. 609(a)(1)(B).

Dated: September 29, 2020

Respectfully Submitted,

ERICA H. MACDONALD
United States Attorney

/s/ Allison Ethen

ALLISON ETHEN
Assistant United States Attorney
Atty. Reg. No. 0395353

BY: JULIE E. ALLYN
Assistant United States Attorney
Atty. Reg. No. 256511

JOHN DOCHERTY
Assistant United States Attorney
Atty. Reg. No. 017516X